



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA

Brian Christian Alexander

#3606434

(Enter above the full name of the plaintiff or plaintiffs in this action).

(Inmate Reg. # of each Plaintiff)

VERSUS

CIVIL ACTION NO. 2:18-cv-1516

(Number to be assigned by Court)

South Central Regional Jail

(Enter above the full name of the defendant or defendants in this action)

COMPLAINT

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes _____ No X

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiffs:

N/a

Defendants:

N/a

2. Court (if federal court, name the district; if state court, name the county);

N/a

3. Docket Number:

N/a

4. Name of judge to whom case was assigned:

N/a

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

N/a

6. Approximate date of filing lawsuit:

N/a

7. Approximate date of disposition:

N/a

II. Place of Present Confinement: South Central Regional Jail

A. Is there a prisoner grievance procedure in this institution?

Yes X No _____

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes X No _____

C. If you answer is YES:

1. What steps did you take? Filed a grievance, called

PREA, Wrote PREA, Had Family call too.

2. What was the result? Sent Lt. Payne to talk to

me and nothing was done about this because I just

watched the officer that assaulted me assault another inmate on

D. If your answer is NO, explain why not: 12/6/18

III. Parties

(In item A below, place your name and inmate registration number in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff: Brian Christian Alexander #3606434

Address: SCRJ, 1001 Centre Way, Charleston, WV 25309

B. Additional Plaintiff(s) and Address(es): _____

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants.)

C. Defendant: C/O Sloane

is employed as: Corrections Officer

at South Central Regional Jail

D. Additional defendants: Corrections Officers; Kirkwood
(SCRJ), Payne (SCRJ); Captain Thompson;
Medical Staff; Jessica Thornhill, Nurse
Kadec Dameron

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On 9/20/2018, between the approx. hours of 9:00 p.m.
and 10:30 p.m., I was taken up to booking (after complaining to medical
staff for months; Jessica Thornhill about being denied health care) and was
a victim of physical, and sexual abuse / misconduct by staff.
I was having chest pains and dizziness during med pass (B-5) and upon arrival
to booking, I informed C/O ~~Stone~~ Sloane of this and he began assaulting
me as I went down to one knee. He kept insisting that I was lying.
I am a person that has a chronic care illness, which being Graves Disease
(thyroid condition), and these are symptoms of the disease. Officer Sloan
then forcefully took me into the back changing room in booking and
assaulted me physically. He then had other officers come into the

IV. Statement of Claim (continued):

back room while he assaulted me. (C/o Kirkwood was one of many officers that came) Officer Sloan choked me, punched me as well as rammed my head into the wall numerous times as he was yelling "take your fucking clothes off." I was having chest pains still during all of this, and he kept telling me I was lying. He had me sprayed while he continued to abuse and assault me. He then ripped my clothes off my person, and as I was on the floor, not resisting, he stated to the officer, "Snatch his fucking underwear off his ass!"

At that time C/o Kirkwood snatched my underwear off my person, exposing my genital area and genitals to the people in the room.

V. Relief

Continued →

See 2 pg. attachment

State briefly exactly what you want the court to do for you. Make no legal arguments.

Cite no cases or statutes.

I would like C/o Sloan to be relieved of his duties as a Corrections Officer, and an investigation started on this situation as well as the medical staff (specifically - Jessica Thornhill) for dereliction of duties, because if medical staff would have done their jobs correctly, this issue would never have come about. I would also like to be compensated for the physical, sexual, and mental abuse caused by the staff of this facility (SCRJ) and an investigation launched on the way this facility is operated.

IV Statement of Claim Continued: pg. 1

As the officer (Kirkwood) did as he was told by C/O ~~Stone~~ Stone, and snatched my underwear off, he touched my genitals during this action. I was sprayed while I was having chest pains then put into a cell until morning (7-4) with no shower while that spray was burning my genital area and the rest of my body all night. I felt degraded and this conduct is unbecoming of a corrections officer.

After writing PREA with no response, I sought help from C/O Payne (Lt.), and he did nothing but tell me he would talk to some people, and till this day I have heard nothing. (Have copies of letters. ^{Called} ~~Anomous~~ #200)

I did file a grievance on this situation but I have not gotten relief or any justification for these events.

My family called here and spoke with Captain Thompson and informed them that ~~He~~ would come speak with me but never did. (Carrie Sears)

I filed this grievance in a timely manner. I filed two grievances on this matter, and they both have not been answered nor investigated by Captain Thompson. I have copies of the grievances filed, and who they were assigned to and the action they did or did not take.

I was denied health care by medical staff which was a direct cause of the above actions (Jessica Thornhill). I have copies of grievances on that as well. Nurse Kadee Dameron consistently refused to give me my meds.

IV. Statement of Claim Continued: pg. 2

Nurse Kadee Dameron refused to give me my graves disease medicine which started off these events. Nurse Makayla had just informed me that my meds were available. When I spoke to her, she also told me that she relayed this information to nurse Kadee, and still this situation happened which started from me not receiving my meds.

On 12/8/2018, I was denied my meds during mid-day med pass by the same Nurse Kadee Dameron. She told me they (my meds) weren't here, but I received them in the morning med pass, as well as the evening med pass, so it is impossible to not have had them at mid-day medical pass. I spoke with another nurse at evening med pass and she stated to me that there was no reason for me to not have them because they were available. I was scared to make a complaint about it because last time I did, I was assaulted sexually and physically by staff. I hope they still have the incident on the booking camera so they can see the beginning of the assault because I made a complaint as soon as I was able and when I am sure the video camera in booking would have been available still, as well as the audio in the back changing room where the assault continued.

V. Relief (continued):

I believe if an investigation took place, they would uncover the same things I am claiming.
I would also like Jessica Thornhill relieved of her position as well as Nurse Kadie Dameron due to them not performing there duties of the Nursing Staff.

VII. Counsel

A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:

N/q

B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?

Yes No _____

If so, state the name(s) and address(es) of each lawyer contacted:

Mark Plants
Carrico Law Office L.C. (304)347-3800
105 Capital St., Ste 300, Charleston, WV, 25301

If not, state your reasons: _____

C. Have you previously had a lawyer representing you in a civil action in this court?

Yes _____ No

If so, state the lawyer's name and address:

H/a

Signed this 11th day of December, 2018.

114
Bee

Brian C. Alexander

Signature of Plaintiff or Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 11, 2018
(Date)

Brian C. Gelfand

Signature of Movant/Plaintiff

Signature of Attorney
(if any)